

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

BRIGITTE KOVACEVICH,

Plaintiff

v.

VANDERBILT UNIVERSITY,

Defendant

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CIVIL CASE NO. 3-09-0068

JUDGE Nixon

Jury Demand

**MOTION BY DEFENDANT AND COUNTER-CLAIMANT
VANDERBILT UNIVERSITY FOR LEAVE TO FILE DOCUMENT UNDER SEAL**

In the Complaint filed in this matter, the Plaintiff refers to a Confidential Settlement Agreement entered into between the Plaintiff and Defendant Vanderbilt University in January, 2008. In the Defendant Vanderbilt University's Answer and Counter-Claim against the Plaintiff, the Counter-Claimant asserts defenses and claims based on that Settlement Agreement. The Settlement Agreement is referred to as an Exhibit to its Counter-Claim but, because of the confidential nature of that Agreement, it is required to file the document under seal.

Accordingly, the Defendant and Counter-Claimant Vanderbilt University moves the Court for leave to file the Settlement Agreement under seal as an exhibit to the Answer and Counter-Claim.

Dated this 19th day of February, 2009.

BASS, BERRY & SIMS, PLC.

/s William N. Ozier

William N. Ozier (BPR # 003409)
315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238-0002
615/742-6200

Kevin Davis (BPR # 016054)
University Counsel
Office of the General Counsel
Vanderbilt University
2100 West End Avenue, Suite 750
Nashville, Tennessee 37203

Attorneys for Defendant and Counter-Claimant,
The Vanderbilt University

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished by the Court's electronic filing system to Richard J. Braun, Esq., Braun & Associates, PLLC, 501 Union Street, Suite 500, Nashville, Tennessee 37219, on this 19th day of February, 2009.

/s William N. Ozier

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